



## CALIFORNIA URBAN WATER AGENCIES

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December 7, 1995

Mr. Lester A. Snow  
Executive Director  
CALFED Bay-Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, CA 95814

Comments on Development of Alternatives

Dear Lester:

CUWA agency staff who have participated in the series of workshops, including the workshop December 4, offer the following notes which we hope will be useful in development of a list of specific alternatives to be discussed at the next workshop February 26, 1996.

Level of Detail - In the most recent two workshops participants had difficulty developing and assessing actions, categories of actions and alternatives due to the lack of specificity in many of the actions. For example, many of the actions refer to the modification, management or improvement of certain activities without indication of what is specifically intended. While the narrative in appendix B of the December 4th packet describing the actions provides some level of detail, as CALFED develops a set of alternatives the scope of the actions within each must be specified in order to be able to assess the alternative against CALFED's solution principles and against other alternatives.

Providing a reasonable level of detail in the list of alternatives your program develops will be critical if you follow the 'core approach' which was discussed at the December 4, workshop and which we support. In order for stakeholders to buy-in to a core of activities which are basic to any reasonable alternative, a sound understanding of the core actions is needed. These actions should, if possible, be described in quantitative terms indicating exactly what action will take place, how much of an action will be accomplished and the location of action.

Demand Management Actions - At all of the workshops the subject of actions which reduce the demands upon water supply from the Delta have been raised. CUWA feels that demand management, which in the CALFED context includes alternative supply development actions such as wastewater reclamation, are actions which can be common to any reasonable alternative but which are not viable alternatives to comprehensively address Bay-Delta Program objectives unto themselves. However, there is much confusion on how these actions might affect the need for other actions to address conflicts in the Bay-Delta system. This is especially true


with respect to the effect of implementation of Urban Best Management Practices for Water Conservation upon overall growth in urban demands. In order to attempt to provide guidance on this issue, CUWA will be convening its member agencies planning principals to develop some summary guidance on this issue. We will draw on the information provided through the integrated resources planning processes of our agencies to assess reasonable expectations of demand management. We will also develop information on what might be considered extreme demand management options which can provide some information to CALFED on how sensitive alternatives will be to different levels of demand management. We will invite CALFED staff to participate in this exercise.

Water Supply Objectives - The water supply objectives of the program continue to give us concern. This concern looks toward the time when CALFED must select an alternative. In order for a Bay-Delta solution to meet needs of exporters and diverters, the project purpose must serve objectives which address those needs. CALFED's current primary objective for water supply availability simply states the need to "... reduce conflict between beneficial uses and improve the ability to transport water through the Bay-Delta system" and to "reduce the uncertainty of Bay Delta system water supplies...". Unless there are specific objectives to meet exporter and diverter needs, then the project purpose may not be constructed such that the solutions is satisfying to water users. Under Clean Water Act 404 criteria, the alternative selected must be the "least (environmentally) damaging practicable alternative" that meets the project's purpose. Thus, if there are no specific objectives which meet exporter/diverter needs, a project who's purpose is primarily ecosystem restoration and minimally meets the aforementioned objectives must be selected because it meet the project's purpose. This could produce an unsupportable alternative in the view of water user stakeholders.

At the September workshop establishing objectives for the Bay-Delta ecosystem, draft water supply objective statements were discussed which provided more detail. We wish to be assured that these statements have not been deleted. Further, we recommend that the language be made more specific to provide that Bay-Delta water supplies are available to meet the reliability goals of urban water agencies in the context of integrated resources planning.

I hope you find these suggestions useful. Please contact me if you would like to discuss these issues further.

Sincerely,

  
Byron M. Buck  
Executive Director

cc. CUWA/AG CALFED Process Team

BDAC Members: Foley, Kamei, Selkirk, Madigan

Steve Hall, ACWA

CUWA Board of Representatives